



BRYAN CAVE LEIGHTON PAISNER LLP  
1290 Avenue of the Americas  
New York NY 10104 3300  
T: +1 212 541 2000  
F: +1 212 541 4630  
bclplaw.com

May 9, 2022

Christine Cesare  
Partner  
Direct: +1 212 541 1228  
Fax: +1 212 904 0506  
cbcesare@bclplaw.com

The Honorable Lorna G. Schofield  
Thurgood Marshall United States Courthouse  
United States District Court for the S.D.N.Y.  
40 Foley Square  
New York, NY 10007

**Via ECF**

**Re: *Crestmark, a division of MetaBank, N.A. v. Eillien Lorena Cabrera DeLandestoy and AY-AY Telco Management Services, LLC***  
**Civil Case No. 22 Civ. 2253 (LGS) – Request for Extension of Time**

Dear Judge Schofield:

We represent Plaintiff Crestmark, a division of MetaBank, N.A. (“Crestmark”) in the above-referenced action.

With Defendant Eillien Lorena Cabrera DeLandestoy’s (“Cabrera DeLandestoy”) consent, we write to request an extension of time to file the Joint Letter, currently due May 11, 2022, and propose that the Initial Conference, currently scheduled for May 18, 2022, be adjourned. As noted in counsel for Cabrera DeLandestoy’s letter to Your Honor (Dkt. No. 39), counsel for Plaintiff Crestmark and counsel for Defendant Cabrera DeLandestoy are holding a meeting with Defendant Cabrera DeLandestoy, today May 9, 2022. Furthermore, Defendant Cabrera DeLandestoy’s time to oppose the order of attachment has been extended to May 22, 2022 (Dkt. No. 40).

Accordingly, counsel for Crestmark and counsel for Cabrera DeLandestoy propose that the deadline to file the Joint Letter be extended to June 22, 2022, and the Initial Conference be adjourned to June 29, 2022, subject to Your Honor’s availability. This is the Parties’ first request for an extension of time to file the Joint Letter and adjournment of the Initial Conference.

As of this writing, neither the owner of AY-AY Telco Management Services, LLC, Tristan Martinez Deschenes, nor its counsel have appeared or requested an extension of time.

Thank you for the Court’s attention to this matter.

Application **GRANTED**. The conference scheduled for May 18, 2022, is **ADJOURNED to June 29, 2022, at 4:10 p.m.** By **June 22, 2022**, the parties shall file a joint letter and proposed case management plan.

Dated: May 10, 2022  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

The Honorable Lorna G. Schofield  
May 9, 2022  
Page 2



Respectfully submitted,

*/s/ Christine B. Cesare, Esq.*

**Christine B. Cesare**  
Partner

Cc (via ECF): Cindy Brown, Esq., counsel for Cabrera DeLandestoy  
([cbrown@tilemlawfirm.com](mailto:cbrown@tilemlawfirm.com))